

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMPEX CORPORATION,

Plaintiff,

v.

EASTMAN KODAK COMPANY,
ALTEK CORPORATION and CHINON
INDUSTRIES, INC.,

Defendants.


C.A. No. 04-1373-KAJ

**DEFENDANTS' APPLICATION FOR ORAL ARGUMENT ON THEIR
MOTION TO BIFURCATE AND MOTION FOR PROTECTIVE ORDER**

Pursuant to Local Rule 7.1.4, Defendants hereby apply for oral argument on their motion to bifurcate the issues for this patent infringement trial into two phases: (1) liability and damages; and (2) willful infringement, and for a protective order staying discovery relating to opinions of counsel until after liability has been adjudicated.

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2006, I electronically filed **DEFENDANTS' APPLICATION FOR ORAL ARGUMENT ON THEIR MOTION TO BIFURCATE AND MOTION FOR PROTECTIVE ORDER** with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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I hereby certify that on March 15, 2006, I have forwarded the above-noted document to the following as noted below:

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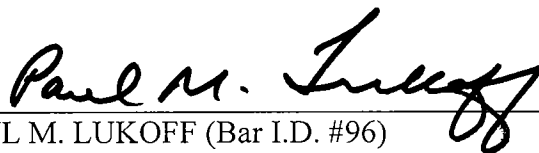
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